

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Thomas J. Prim,

Debtor.

Case No. 23-10256-amc

Chapter 13

**Supplemental Memorandum of Law in Support of Debtor's Objection
to Claim No. 5 of Claimant Defense Finance and Accounting Service**


As discussed at the hearing of April 10, 2024, the Clerk's noticing practices are inconsistent with respect to the governmental bar date in cases converted from chapter 7 to chapter 13.¹ Below is a list of all cases converted from chapter 7 to chapter 13 by debtors represented by Cibik Law, P.C. since December 1, 2017.² The original governmental bar date was printed on the Clerk's notice in every case, except those highlighted.

Case No.	Date Filed	Date Converted	Gov't Bar Date
23-13908	12/25/2023	02/07/2024	08/05/2024
23-11050	04/11/2023	09/21/2023	10/10/2023
23-11430	05/16/2023	09/07/2023	11/13/2023
This Case	01/27/2023	08/01/2023	01/08/2024
23-11013	04/06/2023	06/28/2023	10/03/2023
22-12742	10/13/2022	11/15/2022	04/11/2023
21-12276	08/18/2021	12/15/2021	02/14/2022
21-12833	10/18/2021	11/24/2021	04/16/2022
20-14011	10/07/2020	11/25/2020	04/05/2021
19-14592	07/22/2019	10/02/2019	01/18/2020

1. This statement is not intended pejoratively. The Debtor's counsel regularly practices in two other bankruptcy court districts and believes that the Eastern District of Pennsylvania has the best clerk's office, by far.
2. Before December 1, 2017, Fed R. Bankr. P. 3002 prescribed that proofs of claim be filed 90 days after the first scheduled meeting of creditors. The Debtor omitted cases converted before this date in the interest of providing an apples-to-apples comparison.

Date: April 10, 2024

CIBIK LAW, P.C.
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